

Dear FCC,

This is in regards to Petition RM-10740 filed on May 27, 2003 by Mr. Michael Lonneke, W0YR, and Mr. Melvin Ladisky, W6FDR.

In their petition for rule making both petitioners make no secret that their regulatory request is aimed squarely at those amateurs who are experimenting with enhanced SSB signals which are wider than the 2.8 kHz that they believe should be the maximum bandwidth.

They claim that Enhanced Single Side Band is bothersome to other operations and that some users of the pseudo mode are unwilling to cooperate in minimizing harm being caused. The petition also mentions the legacy mode of AM, and said quote, it does not create the same problems that the burgeoning use of so-called 'Enhanced Single Sideband' creates.

What Mr. Lonneke and Mr. Ladisky do not bother or fail to explain is why they also targeted users of AM whom they freely admit are not causing a problem for other radio amateurs.

Interference such as transmitter splatter which they are complaining about can be the result from receiver overload in the case of extremely strong signals, especially from those transmissions being radiated locally. Amateurs should be careful to make sure they are not complaining about someone or a group merely because their signals are strong, causing splatter at their locations which would not be noticeable at a distance. Even in the case of one-hop skip, a signal can be so strong as to produce overloading in some receivers.

Furthermore, currently many present day amateur radio violations of splatter, over driven amplifiers, and poorly administered audio lash ups can already trigger FCC enforcement action under existing FCC rules governing the purity of signals. Reference; Amateur Radio Service Rule 97.307 Emission Standards.

Experimentation on the amateur radio HF bands is something that has been part of amateur radio since its beginning. Even the Amateur Radio Service Rule 97.3(a) states that the amateur radio Service is a radio communications service for the purpose of self-training, intercommunications and technical investigations carried out by amateurs.

If both petitioners were experiencing problems with audio interference issues then why did they not inform the ARRL Official Observers first. So that

they could have taken a closer look into the allege interference matter and helped with bringing about a resolution to the on air discrepancies, this is something both petitioners never did.

Instead, what Mr. Lonneke and Mr. Ladisky did, is bypass the Official Observers altogether and acted on their own accord and filed a petition for rule making for something that appears to be nothing more than a amateur-to-amateur disagreement or squabble with a group of amateurs.

This after FCC Enforcement Counsel Riley Hollingsworth, K4ZDH, who wrote letters to several members of another enhanced SSB group telling them the agency had received interference complaints. Letters that did not validate nor dispute the complaints, but warned the stations that if such complaints continued, the unresolved friction could trigger petitions for rulemaking. One such petition now at hand.

I am against RM-10740 and say NO to establishing SSB and AM transmission bandwidth standards on HF frequencies below 28.8 MHz, because having the loosely defined technical standards as we currently now have allows amateurs the greatest range for experimentation in ham radio as long as such signals are clean and because amateur radio violations of splatter, over driven amplifiers, and poorly administered audio lash ups can already trigger FCC enforcement action under existing Amateur Radio Service Rules. Once again I say No to RM-10740

Sincerely,

Victor Magana, N1VM